REMINDER:	Do not complete the foregoing pages.	ne following with	oout reading c	arefully the definitions	and other infor	mation set o	out in the	
•								
			•				-	
	•		*					
4.		•						
			CERTIFICA	TION OF PREFER	ENCES			
*			CENTITION	I TON OF THE LEN				
•								
	·			MINORITY				
			•	MINORITY	•			
1. The applic	cant certifies that it i	is entitled to and	d seeks to clai	m minority preference	 9.		Yes	X
if yes, c	omplete the following	; ·		•				
			•					
				Percentage intere	st			
Name	•	Address		in the applicant		Minority	Group	
	•							
	•		•	• •	•			
	•	•						
•								
				•				
	•	•					•	
•								
							_	
•			•					
				•				
	•							
				•				
						·		
			DIVERSIFICAT	ON PREFERENCE				
							<u> —</u>	
	cant certifies that it t edia of mass commun		s have no inte	rest, in the aggregate,	exceeding 50 p	ercent	Yes	X
If Yes, D	O NOT respond to d	westions 3 and	4.					
	cant certifies that it it than three mass com			rest, in the aggregate,	exceeding 50 ;	percent .	Yes	X
					_		[V	
				rest, in the aggregate,		percent	X Yes	لــا
in a med	ia of mass communic	ations in the sar	me area to be	served by the propos	ed station.			
		•						
							•	

SECTION VI - EQUAL EMPLOYMENT OPPORTUNITY PROGRAM 1. For Low Power TV applicants, will this station employ on a full-time basis five or more persons? If Yes, the applicant must include an EEO program called for in the separate Broadcast Equal Employment Opportunity Report (FCC Form 396-A). SECTION VII - CERTIFICATIONS XYes 1. For new station and major change applicants only, the applicant certifies that it has or will comply with the public natice requirement of 47 CF.R. Section 73.3580(g). 2. For applicants proposing translator reproadcasts who are not the licensee of the primary station, the Yes applicant certifies that written authority has been obtained from the licensee of the station whose programs are to be retransmitted. Primary station proposed to be reproadcast: Call Sign City State Channel No. 3. The applicant certifies that it has contacted an authorized spokesperson for the owner of the rights to the proposed transmitter site and has obtained reasonable, assurance that the site will be available for its, use if this application is granted.

That person can be contacted at the following address and telephone number:

Name			Mailing Address or Identification Realy-Mlx			
	Edward Rick III		Concrete	Co. of Lancaster, PA		
City		State	ZIP Code	Telephone No. (include area code)		
<u> </u>	Lancaster	PA	17603	(717) 394-0637		

The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and incorporated herein.

The APPLICANT represents that this application is not filled for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

In accordance with 47 C.F.R. Section 1.65, the APPLICANT has a continuing obligation to advise the Commission, through amendments, or any substantial and significant changes in information furnished.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.
U.S. CODE, TITLE 18, SECTION 1001.

I certify that the statements in this application are true, complete and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant
Raystay Company

Title

Vice President

Sipparire

Date

David A. Gardner

March 7, 1989

EXHIBIT 1

The officers, directors, and ownership of voting stock in Raystay Company is as follows:

		Percentage of
Name	Officers	Voting Stock
-	President, Treasurer and Director	50.06%
Estate of Marian B. Gardner, George F. Gardner and David A. Gardner Co-Executors		25.55%
	Vice-President, Secretary, and Director	8.13%
Michael C. Gardner 580 Boxwood Lane Carlisle, PA 17013		8.13%
David A. Gardner Trustee For Jon C. Gardner c/o Box 38 Carlisle, PA 17013		8.13%

EXHIBIT 2

Raystay Company is filing the following five low power television applications in the window period ending March 10, 1989.

Location of Proposed Station	Channel Number
Red Lion, PA	56
Lebanon, PA	55
Lebanon, PA	38
Lancaster, PA	23
Lancaster, PA	31

EXHIBIT 3

Mr. George F. Gardner, President, Director and principal stockholder in Raystay company, is the President, Director, and sole stockholder in Adwave Company (Adwave), applicant for construction permit for a new FM broadcast station at Fort Lauderdale, Florida Docket No. 84-1113, File No. (MM) 830510AL). In Partial Initial Decision а Administrative Law Judge Joseph Stirmer (FCC 870-20) released June 4, 1987, a misrepresentation/lack of candor issue was decided adversely to Adwave. Commission had previously directed that all appeals in such cases involving applicants seeking licenses held by RKO General, Inc., be stayed, but has recently set March 16, 1989, as the date for filing of exceptions such Partial Initial Decisions. Accordingly, Adwave will timely file with the Review Board its appeal of the Partial Initial Decision.

ENGINEERING STATEMENT IN SUPPORT OF AN APPLICATION FOR A CONSTRUCTION PERMIT FOR A NEW LOW POWER TELEVISION STATION ON CHANNEL 23 IN LANCASTER, PENNSYLVANIA

On Behalf of RAYSTAY COMPANY

EE-1

March 3rd, 1989

ENGINEERING STATEMENT IN SUPPORT OF AN APPLICATION FOR A CONSTRUCTION PERMIT FOR A NEW LOW POWER TELEVISION STATION ON CHANNEL 23 IN LANCASTER, PENNSYLVANIA

On behalf of RAYSTAY COMPANY

EE-1

Index:

- 1. Declaration of Engineer
- 2. FCC Form 346, Section II
- 3. Narrative Statement

3

- 4. Fig. 1A, Topographic Map of Proposed Site
- 5. Fig. 1B, Section of Topographic Map
- 6. Fig. 2, General Area Map
- 7. Fig. 3, Vertical Plan Sketch of Proposed Antenna & Supporting Structure
- 8. Fig. 4, Tabulation of Bogner type B16UA Relative Field Strength
- 9. Fig. 5, Horizontal Plot of Ant Relative Field Strength Oriented at N-286-E
- 10. Fig. 6, Vertical Plane Shape Factor for B16UA Antenna
 with -2 Degrees Beam Tilt

ENGINEERING STATEMENT IN SUPPORT OF AN APPLICATION FOR A CONSTRUCTION PERMIT FOR A NEW LOW POWER TELEVISION STATION ON CHANNEL 23 IN LANCASTER, PENNSYLVANIA On behalf of RAYSTAY COMPANY

EE-1

DECLARATION

Robert Lloyd Hoover declares and states that he is a Registered Professional Engineer in the State of Maryland and seven other states. He further states that he has been in broadcast engineering since 1948 to date.

He states that he has been retained by Raystay Company for the purpose of preparing an application for a Construction Permit for a new Low Power Television Station on Channel 23 in Lancaster, Pennsylvania.

He further states that the calculations, exhibits and measurements reported herein were made by him personally or under his supervision and all facts contained herein are true of his own knowledge, except where stated to be on information or belief, and as to those facts, he believes them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Robert Lloyd Hoover, PE

Date: - 1/2/1/37

78

of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted. Make Type 3. Transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 5. Transmitting antenna x Directional "off-the-shelf"	ted. Output Power P
23 1.0 kilowatts requency Offset (check one) No offset X Zero offset ranslator input Channel No. n/a Proposed transmitting antenna location: City Lancaster Address or other description of location: Erick Rd Lancaster, PA Attach as an Exhibit a map or maps (preferably topographic, if of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted in the proposed transmitting antenna locat	PA Plus offset County Lancaster Geographical coordinates of transmitting antenna to nearest second North Latitude Vest Longitude 40 03 47 76 19 0 Obtainable, such as Geological Survey quandrangles) Exhibit EE- ted. No. Output Power P
ranslator input Channel No. 7. Proposed transmitting antenna location: City Lancaster Address or other description of location: Erick Rd Lancaster, PA Attach as an Exhibit a map or maps (preferably topographic, if of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted in the proposed transmitting antenna location accurat	County Lancaster Geographical coordinates of transmitting antenna to nearest second North Latitude Vest Longitude 40 03 47 76 19 0 Obtainable, such as Geological Survey quandrangles) Exhibit en drawn thereon the following data: EE- ted. No. Output Power P
Translator Input Channel No. 2. Proposed transmitting antenna location: City Lancaster PA Address or other description of location: Erick Rd Lancaster, PA Attach as an Exhibit a map or maps (preferably topographic, if the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted and the proposed transmitting antenna location accurately plotted and transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 5. Transmitting antenna Directional forfi-the-shelf*	County Lancaster Geographical coordinates of transmitting antenna to nearest second North Latitude Vest Longitude 40 03 47 76 19 0 Obtainable, such as Geological Survey quandrangles) Exhibit en drawn thereon the following data: EE- ted. No. Output Power P
City Lancaster State PA Address or other description of location: Erick Rd Lancaster, PA Attach as an Exhibit a map or maps (preferably topographic, if the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted. 3. Transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 Directional foff-the-shelf*	Geographical coordinates of transmitting antenna to nearest second North Latitude West Longitude 40 03 47 76 19 0 Obtainable, such as Geological Survey quandrangles) Exhibit win drawn thereon the following data: Ted. Output Power P
Address or other description of location: Erick Rd Lancaster, PA Attach as an Exhibit a map or maps (preferably topographic, if of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted accurately. 3. Transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 Andrew Manufacturer Model	Geographical coordinates of transmitting antenna to nearest second North Latitude West Longitude 40 03 47 76 19 0 Obtainable, such as Geological Survey quandrangles) Exhibit win drawn thereon the following data: Ted. Output Power P
Address or other description of location: Erick Rd Lancaster, PA Attach as an Exhibit a map or maps (preferably topographic, if of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted. 3. Transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 Transmitting antenna Directional "off-the-shelf"	Geographical coordinates of transmitting antenna to nearest second North Latitude West Longitude 40 03 47 76 19 0 Obtainable, such as Geological Survey quandrangles) Exhibit win drawn thereon the following data: Ted. Output Power P
Erick Rd Lancaster, PA Attach as an Exhibit a map or maps (preferably topographic, if of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted as a constant of the area of the proposed transmitting antenna location accurately plotted as a constant of the area of the proposed transmitting antenna location accurately plotted as a constant of the area of the proposed transmitting antenna location accurately plotted as a constant of the area of the proposed transmitting antenna location accurately plotted as a constant of the area of the proposed transmitting antenna location accurately plotted as a constant of the area of the proposed transmitting antenna location accurately plotted as a constant of the area of the proposed transmitting antenna location accurately plotted as a constant of the area of the ar	North Latitude West Longitude 40 ° 03 ' 47 " 76 ° 19 ' 0 Obtainable, such as Geological Survey quandrangles) Exhibit win drawn thereon the following data: EE- ted. 3 No. Output Power P
Lancaster, PA Attach as an Exhibit a map or maps (preferably topographic, if of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted. 3. Transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 5. Transmitting antenna Directional foff-the-shelf* Manufacturer Model	North Latitude West Longitude 40 03 47 76 19 0 Obtainable, such as Geological Survey quandrangles) Exhibit win drawn thereon the following data: EE- ted. No. Output Power P
Attach as an Exhibit a map or maps (preferably topographic, if of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Proposed transmitting antenna location accurately plotted as a scale of kilometers b. Pr	
b. Proposed transmitting antenna location accurately plotted. Make Type 3. Transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 5. Transmitting antenna x Directional "off-the-shelf"	obtainable, such as Geological Survey quandrangles) Exhibit EE- ted. No. Output Power P
of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted. Make Type 3. Transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 5. Transmitting antenna Directional "off-the-shelf"	obtainable, such as Geological Survey quandrangles) Exhibit EE- ted. Output Power P
of the area of the proposed transmitting antenna location show a. Scale of kilometers b. Proposed transmitting antenna location accurately plotted. Make Type 3. Transmitter: Acrodyne TLU/ 4. Transmission line: Andrew LDF7 5. Transmitting antenna x Directional "off-the-shelf"	ted. Output Power P
Acrodyne TLU/ 4. Transmission line: Andrew LDF7 5. Transmitting antenna x Directional "off-the-shelf" Manufacturer Model	
5. Transmitting antenna X Directional "off-the-shelf" Manufacturer Model	1.0 kilowa
"off-the-shelf" Manufacturer Model	7-50A PO ft (decimal fraction) 0.8898
Manufacturer Model	Directional Composite Non-Direct (Multiple Antennas)
Bogner B1	16UA Description 1 Slot antenna
Orientation of Overall antenna Elevation main lobe 2 structure height above ground 3	on of Site $\frac{4}{2}$ Power gain G (multiplier) in the horizontal lobe maxmum radiation relative to a halfwave dipole $G_1 = 32 \times (0.5)^2 = 8$
obes: 286 T	$G_{\text{horz}} = 32 \times (0.5)^2 = 8$ for -2 deg beam tilt
	antenna radiation center above ground 41.8 meter
7 17	antenna radiation center 137 ft
above .	above mean sea level 145.4 meter 477 ft
Give basic type using general descriptive terms such as half-wave d	
in-phase array, two stacked 5 element Yagis, etc.	dingle "how-tie" with torsen corner radianter. 10 alament Vani d al-

- 2 For directional antennas in the horizontal plane show the direction of the main radiation lobe(s) in degrees with respect to true north in a 360 degree horizontal azimuth, numbered clockwise, with true north as zero azimuth.
- 3 Show overall height above ground in meters to topmost portion of structure, including highest top mounted antenna and beacon if any,
- 4 Show the ground elevation above mean sea level in meters at the base of the transmitting antenna supporting structure.
- 5 Give the actual power gain toward the radio horizon.
- 6 This is equal to the sum of the site elevation and the height of the antenna radiation center above ground.

11

Section () (Page 2)			
6. Attach as an Exhibit a vertical plan sketch for the proposed structure, giving overall height of structure in meters above	•	Exhibit No. EE-1	
7. Will the proposed antenna supporting structure be shared w	ith an AM radio station?	Yes X No	
If yes, list the call sign of that station.			
8. Attach as an Exhibit a polar diagram of the radiation pattern transmitting antenna showing clearly the correct relationship minor lobes of radiation and a tabulation of the pattern minima. Applicants proposing use of multiple transmitting a pattern. If a non-directional transmitting antenna will be emplored in the radiation pattern, check here and omit polar manufacturer and model number are on the Commission's lantennas, check here and omit polar diagram and tabulat	between the major lobe or lobes and the at every ten degrees and all maxima and internas shall submit a composite radiation loyed, i.e., an antenna with an approximately ar diagram and tabulation. If the antenna list of common "off-the-shelf" directional	Exhibit No. EE-1	
9. Has FAA been notified of proposed construction ?		x Yes No	
If Yes, give date and office where notice was filed:	arch 3rd, 89, Eastern Regional Office		
10. Environmental Statement (See 47 C.F.R. Section 1.1301 et			
Would a Commission grant of this application come within a significant environmental impact, including exposure to nonionizing radiation levels?	•	Yes 🗱 No	
If you answer Yes, submit as an Exhibit an Environmental A If no, explain briefly why not. See Exhibit I	·	Exhibit No.	
	4		
11. Unattended operation: Is unattended operation proposed?		X Yes No	
If Yes, and this application is for authority to construct facilities of an authorized station which proposes unatte will comply with the requirements of 47 C.F.R. Section	nded operation for the first time, applicant	x Yes No	
12. Is type approved broadcast equipment being specified? If No, indicate date equipment was submitted to FCC Laboratory for approval.			
		•	
I certify that I represent the applicant in the capacity indicate technical information and that it is true to the best of my known		going statement of	
	Signature		
March 3rd, 1989	1 21.40/1//	j	
Date	Typed or Printed Name Robert Lloyd Hoover, PE		
	Telephone No. (include area code) (301) 983-0054		
Technical Director X Registered	Professional Engineer	Consulting Engineer	
Chief Operator Other (spec	erfy)		

ENGINEERING STATEMENT IN SUPPORT OF AN APPLICATION FOR A CONSTRUCTION PERMIT FOR A NEW LOW POWER TELEVISION STATION ON CHANNEL 23 IN LANCASTER, PENNSYLVANIA On behalf of RAYSTAY COMPANY

EE-1

I. GENERAL

3

This engineering statement has been prepared on behalf of Raystay Company. The purpose of this statement is to request a Construction Permit for a new Low Power Television Station on Channel 23 in Lancaster, Pennsylvania. This is one of five applications being filed by Raystay Company in Pennsylvania.

Tha applicant proposes to operate on Channel 23 with a directional antenna system having a maximum Effective Radiated Power of 7.12 kW in the horizontal plane. An electrical beam tilt of -2 degrees is proposed for the antenna. The applicant proposes to operate with a precise Zero Offset Carrier Frequency.

This application is not a major environmental hazard, as defined by Section 1.1305 of the Rules. The proposed operation is in compliance with the safety standards specified in Section 1.1307(b), that is, the exposure of the general public and workers to the ANSI C95.1 1982 exposure guidelines.

Answers to questions in the Form 346 are provided in the attached statement.

II. PROPOSED OPERATION

A. Proposed location

The proposed site would be on the roof of a building in an industrial complex in Lancaster, Pennsylvania. The geographical co-ordinates of the proposed site are:

N 40° 03' 47" W 76° 19' 09"

A topographic map showing the proposed site is provided in Figure 1A and the applicable section of that topographic map is provided in Figure 1B. A general area map of the area is shown in Figure 2. Inasmuch as the overall height of the proposed antenna and its supporting structure would be 57.0 meters (187 feet) agl, the FAA Eastern Regional Office was notifed.

B. Proposed Antenna System & Supporting Structure

3

The applicant proposes to mount a Bogner type B16UA antenna below another proposed Bogner type B16UA for Channel 31, where both antennas would be supported by a 30-ft (9.1 m) pedestal. The antenna and its supporting structure would be constructed on the roof of a building. The building roof is 90 feet (27.4 meters) agl, which was recently measured with a surveyors cord. The Center of Radiation would be 41.8 meters (137 feet) agl or 145.4 meters (477 feet) amsl. A vertical plan sketch of the proposed antenna and its supporting structure is shown in Figure 3.

The applicant proposes to use a Bogner type B16UA antenna oriented at N-286-E where its main lobes are in this direction as well as N-356-E and N-216-E. The antenna is specified to have a -2 degree beam tilt.

For a -2 degree beam tilt the B16UA antenna Vertical Plane (Shape or Form) Pattern has a relative field strength value of 0.5 in the horizon compared to a maximum value of unity or one at the depression angle of -2 degrees. The Antenna Power Gain in the horizontal plane is 0.25 of that value at the depression angle. That is, multiplying the square of the Vertical Plane (Shape) Pattern value in the horizon times the maximum Power Gain of the Antenna in its depression angle results in a Power Gain in the horizontal plane of 8, viz,

$$G_{at horz} = (0.5)^2 \times 32 = 8$$

The vendor warrants that the Vertical Plane (Shape)
Pattern holds in all azimuthal directions; therefore, the
ERP in the horizontal plane in all azimuthal directions
is equal to or less than 7.12 kW.

C. Operational Specifications

It is proposed to install an Acrodyne type TLU/1KACT LPTV transmitter that is rated to deliver 1000 peak watts into a dummy load. The transmitter is type accepted for Part 74 of the Rules. The transmitter will be specifed to maintain a precise frequency offset of $\stackrel{+}{-}$ 1 kHz at a specified designation of Zero Carrier Offset from the standard carrier frequency on Channel 23. The Bogner LPTV type B16UA antenna with a -2 degrees beam tilt provides a power gain of 8 above that of a dipole (9 dBd) in the horizontal plane. The antenna would be oriented

at N-286-E, where the main lobes would also point in this direction and N-356-E and N-216-E. A tabulation of the relative field strength in the horizontal plane is provided in Figure 4, and a horizontal plot of these data is shown in Figure 5. The proposed transmission line would be Andrew type LDF7-50A, which has an attenuation of approximately 0.563 dB per 100 feet at the visual carrier frequency of 525.25 MHz. The efficiency for the proposed 90-ft length of cable is approximately 88.98 percent. For 1-kW Transmitter Power Output with a line efficiency of 88.98 percent and antenna power gain of 8, the Effective Rated Power would be 7.12 kW.

D. Proposed Coverage

3

Inasmuch as the proposed site is within the Lancaster city limits, the 74-dBu contour will provide coverage over all of Lancaster and its immediate vicinity.

III. ENVIRONMENTAL CONSIDERATION

No significant environmental impact would result due to the Commission granting this applicant.

A. Environmental Impact Statement

The applicant proposes to mount its Channel 23 antenna below a Channel 31 antenna, where the two antennas would be supported by a 30-ft (9.15 m) tower on the roof of a building in an industrial complex. The applicant is also applying for an LPTV license on Channel 31 in Lancaster. Such construction would be not be a Major Action.

This application would not come within Section 1.1307 of the Rules. The applicant does not propose to use high intensity lighting. No environmental impact is involved since the proposed site is not in an area that would constitute an environmental impact since it is not located in any known wilderness and/or wildlife areas, historic and/or scenic areas and will not involve extensive changes to the existing terrain features. No known migratory bird or animal path would be blocked by mounting the proposed Channel 23 and Channel 31 LPTV antennas on a 30 ft (9.15-m) tower on a building roof in an industrial complex of Lancaster.

B. National Environmental Policy Act of 1969

This application will not result in radiofrequency radiation in excess of the applicable safety standards specified in Section 1.1307(b), that is, the exposure of workers and the general public would be based upon the

recent ANSI C95.1 1982 exposure guidelines.

3 ′

In the UHF TV Band the ANSI standard would limit exposure to human beings to less than $f/300~\text{mW/cm}^2$, where f is frequency in megahertz. For Channel 23 the ANSI Radio Frequency Protection guideline would be less than 1.75 mW/cm 2 . Measurements on UHF TV antennas after prediction verify that as a least upper bound the Power Density, PD, would be

$$PD = \frac{EIRP}{40 \pi r^2} \qquad mW/cm,$$

where EIRP is the Effective Isotropic Radiated Power in watts and r is the appropriate slant distance from the antenna radiation center in meters, for example, to head height or 7 feet (2.13 meters) above the level of the building roof. During normal programming the EIRP is approximately equal to 0.4 times the visual effective radiated power plus the aural effective radiated power times 1.64, where consideration would be given to the square of the Vertical Plane shape or form factor for the antenna, $f(\Theta)$, viz,

EIRP
$$\sim$$
 (1.64)[(0.4)ERP_{vis} + ERP_{aur}] $f^2(\Theta)$

EPA guidelines suggest a reflection co-efficient of 1.6 be adopted. Using this EPA guideline, an EPA value for the Power Density, PD, adjusted for such a reflection co-efficient would be

$$PD' = (1.6)^2 PD$$

The minimum distance from the Center of Radiation at head height above roof level would be (47-7) feet or 40 feet. The far-field region of a high gain UHF antenna does not obtain for approximately 1500 feet from the antenna. On the roof in the vicinity of the antenna, near-field theory applies. A cautious approach in such a near-field region would be to assume a Vertical Plane Shape factor of 0.25 albeit with a fixed slant range of 40 feet. In addition, the far-field EIRP value is assumed. This latter assumption presumes that the antenna has provided its full gain even in the near-field region. With these assumptions an EPA adjusted Power Density, PD', becomes at head height at any place on the roof,

 $PD' = 1.405 \times 10^{-5} [(0.4)ERP_{vis} + ERP_{aur}] mW/cm^2$, on Channel 23.

For a visual ERP of 28,472 watts and aural ERP of 2847 watts (that actually would not obtain until the far-field region in the main beam at the depression angle of -2

degrees), the EPA adjusted Power Density, PD', becomes 0.2 mW/cm². This represents approximately 11.43 percent of the ANSI C95.1-1982 guideline of 1.75 mW/cm² at 524 MHz.

The applicant has also applied for an LPTV Construction Permit on Channel 31 in Lancaster, where a similar Bogner B16UA antenna is proposed. The Channel 31 antenna is proposed to be mounted on the 30-ft tower above the Channel 23 antenna. In the event of Commission approval of both applications, a similar approach for the Channel 31 antenna is provided. The proposed Center of Radiation of the Channel 31 antenna would be (79-7) or 72 feet above head height on the roof. A value for the near-field Vertical Plane shape factor of 0.25 is assumed with a fixed slant range of 72 feet. A far-field Effective Radiated Power of 26,979 visual watts and 2698 aural watts is assumed. Using the same procedure as in the Channel, 23 case, an adjusted EPA Power Density of 0.058 mW/cm2 is obtained. This represents approximately 3.04 percent of the ANSI quideline value of 1.91 mW/cm2 for the Channel 31 frequency of 572 MHz.

Adding the two percentages of ANSI allowable electromagnetic radiation cases for Channel 23 and Channel 31 yields approximately 14.5 percent of the ANSI standard. It can be seen that no radiation hazard will exist on the building roof at head height below the antenna, even with these cautious assumptions. A conservative estimate for the real-world Vertical Plane shape factor in the near-field region on the building roof for both antennas may possibly exceed 0.25, but the slant range was fixed for both antennas. Near the edge of the roof the near-field Vertical Plane shape factor may possibly increase in value but the inverse square of the slant range would become significantly smaller. Rather than assuming the far-field Effective Radiated Power value (at the -2 degree depression angle), it has been your affiant's experience*/ that the real-world

For example, in February 1979 your affiant prepared a deposition for officials of the City of Winston-Salem, North Carolina that predicted the power density using near-field theory for WGNN-TV that would operate with 1500 kW from its antenna mounted on a 30-ft pedestal on top of the Wachovia National Bank Building. Later measurements after WGNN-TV was built confirmed that the predictions were within 10 percent of the measured values. In 1981, your affiant prepared a similar depostion for officials of Multnomah County, Oregon, on behalf of KRLK Broadcasting Corp. In the intervening years a number of predictions and corresponding measurements have been made by your affiant confirming that the power density as would be predicted for the near-field region using the appropriate near-field approach yields power density values generally less than predicted by far-field theory.

Power Density value in such a near-field region would be considerable less and approximately equal to the sum of the Power Densities obtained at head height on the roof from each individual slot or radiator of the antenna, with the Antenna Input Power divided between each such slot or radiator. The final Power Density result is considerable less than this rough approach indicates, but the analysis is rather detailed.

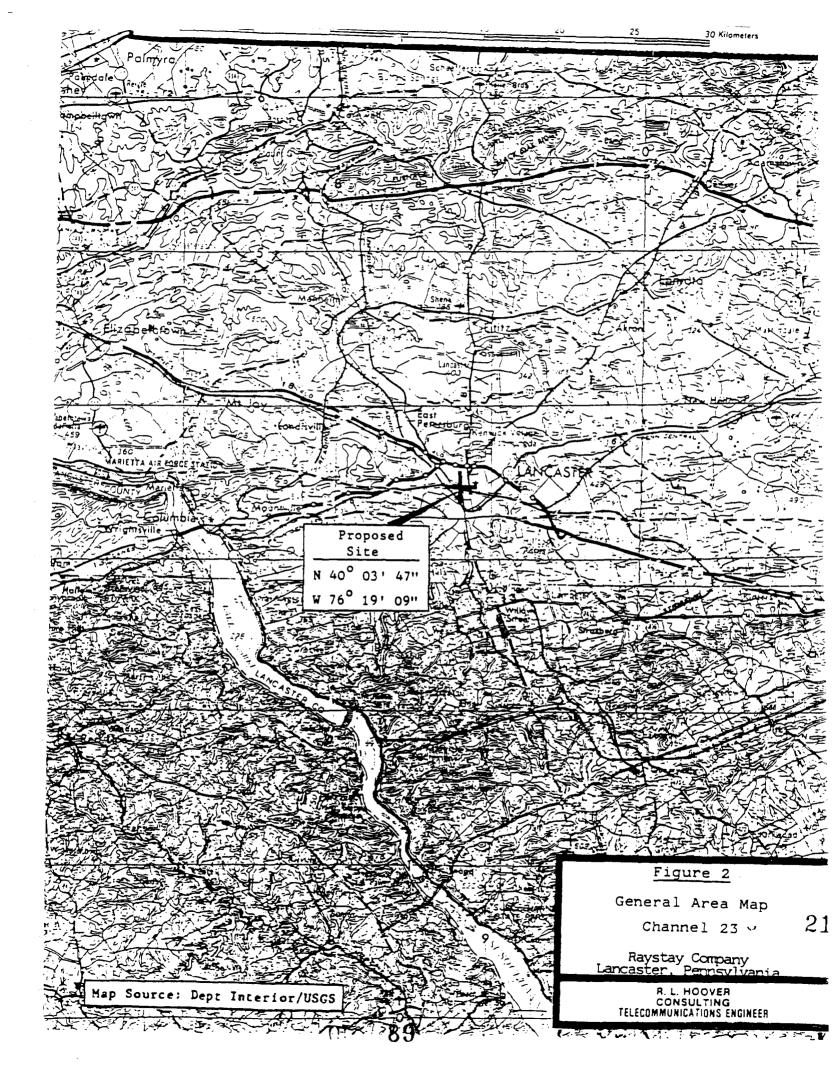
IV. SUMMARY

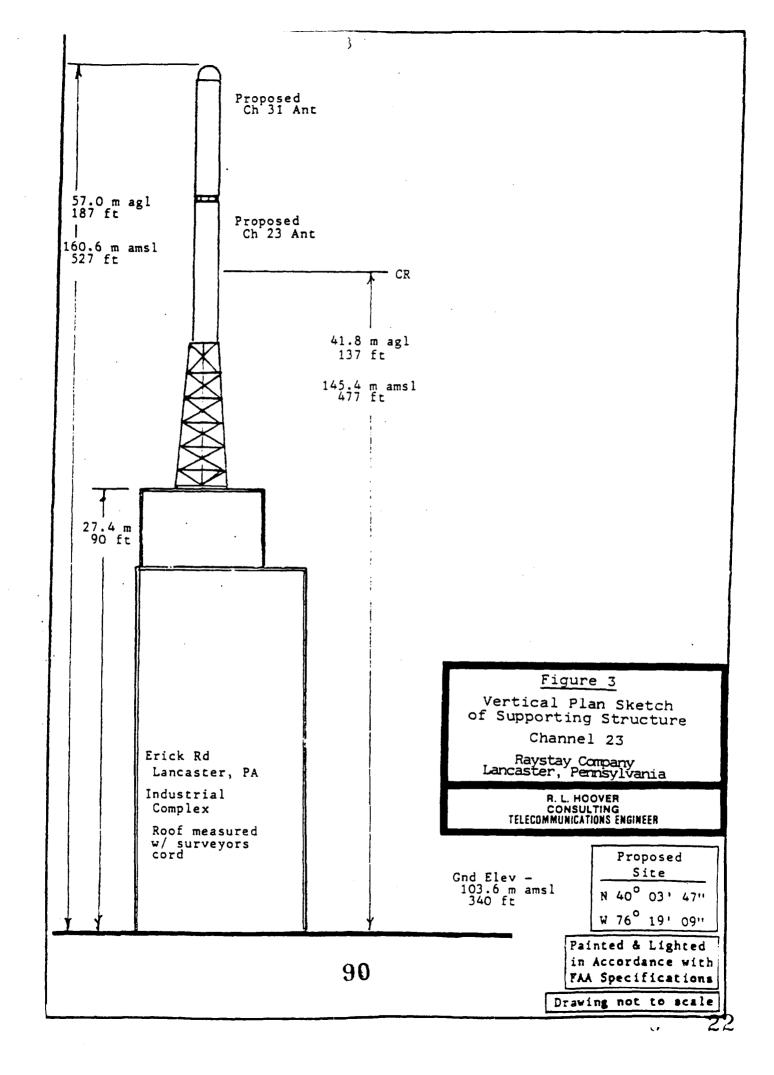
Raystay Company requests a Construction Permit for a new Low Power Television facility on Channel 23 with precise Zero Frequency Offset in Lancaster, Pennsylvania. The application is in full compliance with the Commission's final rules concerning Low Power Television stations.

March 3rd, 1989

Robert Lloyd Hoover, PE Maryland No. 11572.







R. L. HOOVER CONSULTING TELECOMMUNICATIONS ENGINEER

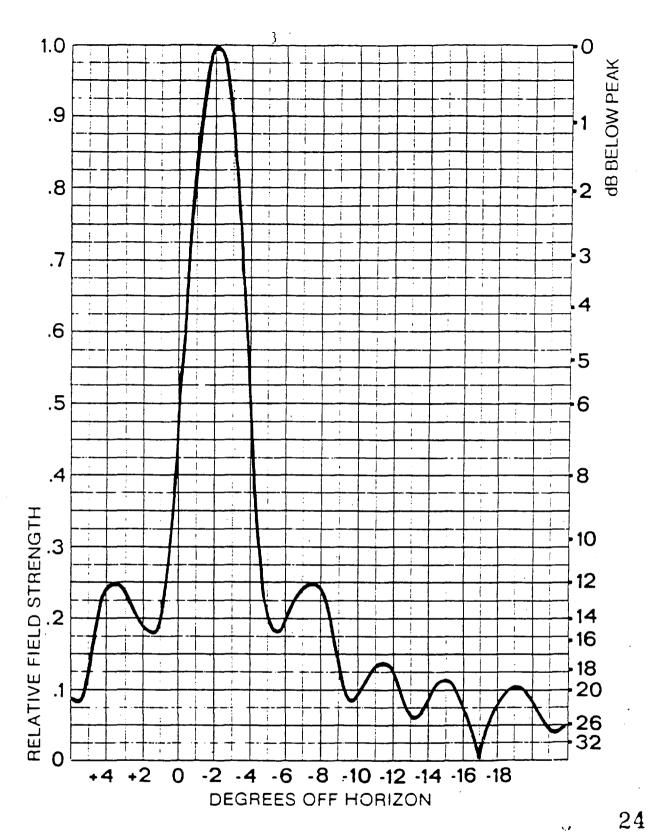
Figure 4

Tabulation of Bogner type B16UA Antenna Relative Field Strength in the Horizontal Plane from the Commission's Files

Channel 23

Raystay Company Lancaster, Pennsylvania

AZIMUTH	TABULATED GAIN			
0.00	1.000	Main Lobe Oriented	a t	N-286-E
10.00	0.970	Of Terriced	ac	., 200 E
20.00	0.950			
30.00	0.925			
40.00	0.920			
50.00	0.940			
60.00	0,975			
70.00	1.000			
80.00	0.980			
90.00	0.950			
100.00	0.875			
110.00	0.775			
120.00	0.630			
130.00	0.470			
140.00	0.350			
150.00	0.230			
160.00	0.220			
170.00	0.225			
180.00	0.230 0.225			
190.00				
200.00	0.220 0.230			
210.00	0.350			
220.00	0.330			
230.00	0.470			
240,00	0.775			
250.00	0.875			
260.00	0.950			
270.00	0.980			
280.00	1.000			
290.00	0.975			
300.00				
310.00	0.940 0.920			
320.00	0.925			
330.00	0.950			
340.00				
350.00	0.970			



Bogner Broadcast Equipment Corp. Westbury, N.Y. 11590

Figure 6

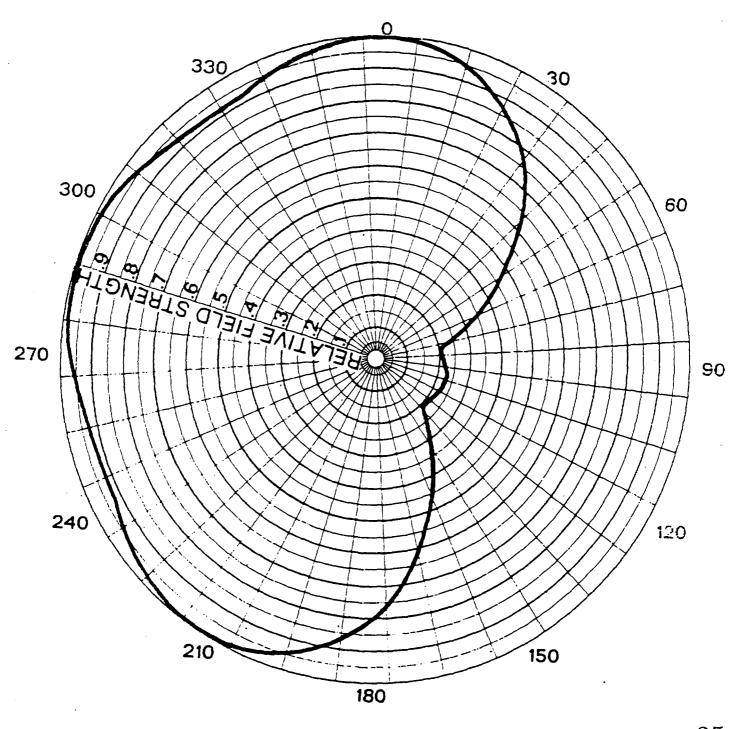
Vertical Shape Factor for B16UA Antenna with -2° Beam Tilt

Channel 23

Raystay Company Lancaster, Pennsylvania

R. L. HOOVER CONSULTING TELECOMMUNICATIONS ENGINEER





25

Bogner Broadcast Equipment Corp. Westbury, N.Y. 11590

Figure 5

Horizontal Plot of Relative Field from B16UA Ant Oriented at N-286-E

> Channel 23 Raystay Company Lancaster, Pennsylvania

R. L. HOOVER CONSULTING TELECOMMUNICATIONS ENGINEER

